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6 *Attorney for Plaintiff*

7 **UNITED STATES DISTRICT COURT**  
8 **DISTRICT OF NEVADA**

9 MALINDA SLATON, an individual,  
10

11 Plaintiff,

12 vs.

13 L.L.O. INC., d/b/a ACME ELECTRIC, a domestic  
corporation; INTERNATIONAL BROTHERHOOD  
14 OF ELECTRICAL WORKERS LOCAL UNION  
357, a domestic not for profit corporation; DOES I  
15 through X, inclusive; ROE CORPORATIONS I  
through X, inclusive,

16 Defendants.  
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CASE NO: 2:17-cv-01561-RFB-DJA

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR  
PLAINTIFF TO RESPOND TO  
DEFENDANT'S MOTIONS AND FOR  
DEFENDANT TO REPLY**  
(First Request)

19 COMES NOW, Plaintiff MALINDA SLATON, (hereinafter, "SLATON"), by and  
20 through her attorney of record Trevor J. Hatfield of the law firm of Hatfield & Associates, Ltd.,  
21 and L.L.O. INC., d/b/a ACME ELECTRIC's (hereinafter "ACME ELECTRIC) and do hereby  
22 stipulate and agree to an extension of time for Plaintiff to respond to Defendant's following  
23 Motions as follows:

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- 25 1. Motion for Summary Judgment on Breach of Contract Claim (ECF #51) filed on August 8,  
26 2019 – Response due on August 29, 2019;
  - 27 2. Motion for Summary Judgment on Title VII Claim (ECF #52) filed on August 9, 2019 –  
28 Response due on August 30, 2019;

1 3. Third Motion for Partial Summary Judgment to Limit Plaintiff's Categories of Damages  
2 (ECF #53) filed on August 12, 2019 – Response due on September 2, 2019;

3 4. Motion to Strike Jury Demand or, in the Alternative, to Bifurcate Liability and Damages  
4 Phases of Trial (ECF #54 and ECF #55) filed on August 13, 2019 – Response due on  
5 August 27, 2019.  
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7 The reason the extension is requested is that Plaintiff's attorney is scheduled for dental  
8 surgery on Tuesday, August 27, 2019, and will require one day for recovery. In addition, the Labor  
9 Day Holiday weekend is August 31 through September 2, 2019. As responses are required for the  
10 Motions, the last one being due on September 2, 2019, the parties have agreed to extend the  
11 response time for each of the Motions one week from each of the respective due dates. Defendant's  
12 replies to Plaintiff's responses will also be extended by one week respectively.  
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14 This request is submitted pursuant to LR IA 6-1, 6-2 and LR II 7-1 and 26-4 and is the  
15 parties' first request for an extension of the time for the parties to respond to the various motion  
16 response deadlines. Accordingly, Plaintiff's proposed response dates and Defendant's proposed  
17 reply dates shall be as follows:

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<u>Document Number</u>	<u>Proposed Response Due Date</u>	<u>Proposed Reply Due Date</u>
1. Motion - ECF #51	September 5, 2019	September 26, 2019
2. Motion – ECF #52	September 6, 2019	September 27, 2019
3. Motion – ECF #53	September 10, 2019	September 30, 2019
4. Motion – ECF #54 and ECF #55	September 3, 2019	September 17, 2019
Dated this 27 <sup>th</sup> day of August 2019.		
Dated this 27 <sup>th</sup> day of August 2019.		
HATFIELD & ASSOCIATES, LTD.	HOLLEY DRIGGS, WALCH	FINE WRAY PUZEY & THOMPSON
<i>/s/ Trevor J. Hatfield</i>	<i>/s/ F. Thomas Edwards</i>	
By: _____	By: _____	
Trevor J. Hatfield, Esq.	F. Thomas Edwards, Esq., SBN 9549	
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Email: <a href="mailto:thatfield@hatfieldlawassociates.com">thatfield@hatfieldlawassociates.com</a>	<i>Attorneys for Defendant L.L.O. Inc. d/b/a Acme</i>	
<i>Attorney for Plaintiff</i>	<i>Electric</i>	

**IT IS SO ORDERED.**

  
\_\_\_\_\_  
RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED this 28th day of August, 2019.

1 **CERTIFICATE OF SERVICE**

2 I certify that on the 27<sup>th</sup> day of August 2019, I electronically filed the foregoing  
3 **STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR PLAINTIFF TO**  
4 **RESPOND TO DEFENDANT'S MOTIONS AND FOR DEFENDANT TO REPLY (First**  
5 **Request)** with the Clerk of the Court by using the ECF system.  
6

7 Dated this 27<sup>th</sup> day of August 2019.

By: /s/ Freda P. Brazier  
An employee of Hatfield & Associates, Ltd.